

# **EXHIBIT 1**

**Butzer, Carl**

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**From:** Shackelford, Jr., Stephen  
**Sent:** Monday, February 7, 2022 5:43 PM  
**To:** Butzer, Carl  
**Cc:** Edgar Sargent; Edwards, John; Dickson, Carter; Lam, Angela; Rohrbacher, Blake K.; Mowery, Katharine Lester; Neerman, Jonathan; Babcock, Chip; Glover, Joel; Justin A. Nelson; Davida Brook; Elisha Barron; Jonathan Ross; Brooke Behrens; Bill Dunseth  
**Subject:** Re: Dominion v. Fox -- NM Documents

**\*\*RECEIVED FROM EXTERNAL SENDER – USE CAUTION\*\***

Hi Carl—I tried to call you earlier. Yes, we do have a redacted copy. We will produce it in our case, pursuant to our protective order, provided we satisfy any requirements we need to under the protective order in the Curling case, and to the extent we have permission in Curling to share it in this litigation, which we do not presently have.

We also now, as of last Friday (February 4), have an unredacted copy of the report. We are under the same restrictions for that copy, but we do not think that copy needs to or should be produced in our litigation.

--Stephen

On Feb 5, 2022, at 4:04 PM, Butzer, Carl <[cbutzer@jw.com](mailto:cbutzer@jw.com)> wrote:

**EXTERNAL Email**

Stephen

Just following up on this -- Does Dominion have a redacted copy of the Halderman report from the Curling case? If so, will you agree to produce it to us? Please let me know by COB on Monday.

**Thanks,  
Carl**

**Carl C. Butzer** | Jackson Walker LLP  
2323 Ross Avenue, Suite 600 | Dallas, TX | 75201  
V: (214) 953-5902 | F: (214) 661-6609 | [cbutzer@jw.com](mailto:cbutzer@jw.com)



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**From:** Butzer, Carl  
**Sent:** Tuesday, February 1, 2022 12:32 PM  
**To:** 'Stephen Shackelford' <[SShackelford@susmangodfrey.com](mailto:SShackelford@susmangodfrey.com)>; Edgar Sargent <[esargent@SusmanGodfrey.com](mailto:esargent@SusmanGodfrey.com)>; Edwards, John <[jedwards@jw.com](mailto:jedwards@jw.com)>  
**Cc:** Dickson, Carter <[cdickson@jw.com](mailto:cdickson@jw.com)>; Lam, Angela <[Lam@rlf.com](mailto:Lam@rlf.com)>; Rohrbacher, Blake K. <[Rohrbacher@RLF.com](mailto:Rohrbacher@RLF.com)>; Mowery, Katharine Lester <[Mowery@rlf.com](mailto:Mowery@rlf.com)>; Neerman, Jonathan <[jneerman@jw.com](mailto:jneerman@jw.com)>; Babcock, Chip <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Glover, Joel <[jglover@jw.com](mailto:jglover@jw.com)>; Justin A.

Nelson <jnelson@SusmanGodfrey.com>; Davida Brook <DBrook@susmangodfrey.com>; Elisha Barron <EBarron@susmangodfrey.com>; Jonathan Ross <JROSS@SusmanGodfrey.com>; Brooke Behrens <BBehrens@susmangodfrey.com>; Bill Dunseth <bdunseth@susmangodfrey.com>

**Subject:** RE: Dominion v. Fox -- NM Documents

Thank you. Does Dominion have a redacted copy of the Halderman report?

**Thanks,  
Carl**

**Carl C. Butzer** | Jackson Walker LLP  
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**From:** Stephen Shackelford <[SShackelford@susmangodfrey.com](mailto:SShackelford@susmangodfrey.com)>  
**Sent:** Monday, January 31, 2022 4:31 PM  
**To:** Butzer, Carl <[cbutzer@jw.com](mailto:cbutzer@jw.com)>; Edgar Sargent <[esargent@SusmanGodfrey.com](mailto:esargent@SusmanGodfrey.com)>; Edwards, John <[jedwards@jw.com](mailto:jedwards@jw.com)>  
**Cc:** Dickson, Carter <[cdickson@jw.com](mailto:cdickson@jw.com)>; Lam, Angela <[Lam@rlf.com](mailto:Lam@rlf.com)>; Rohrbacher, Blake K. <[Rohrbacher@RLF.com](mailto:Rohrbacher@RLF.com)>; Mowery, Katharine Lester <[Mowery@rlf.com](mailto:Mowery@rlf.com)>; Neerman, Jonathan <[jneerman@jw.com](mailto:jneerman@jw.com)>; Babcock, Chip <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Glover, Joel <[jglover@jw.com](mailto:jglover@jw.com)>; Justin A. Nelson <[jnelson@SusmanGodfrey.com](mailto:jnelson@SusmanGodfrey.com)>; Davida Brook <[DBrook@susmangodfrey.com](mailto:DBrook@susmangodfrey.com)>; Elisha Barron <[EBarron@susmangodfrey.com](mailto:EBarron@susmangodfrey.com)>; Jonathan Ross <[JROSS@SusmanGodfrey.com](mailto:JROSS@SusmanGodfrey.com)>; Brooke Behrens <[BBehrens@susmangodfrey.com](mailto:BBehrens@susmangodfrey.com)>; Bill Dunseth <[bdunseth@susmangodfrey.com](mailto:bdunseth@susmangodfrey.com)>  
**Subject:** RE: Dominion v. Fox -- NM Documents

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Carl—Dominion does not.

--Stephen

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**From:** Butzer, Carl <[cbutzer@jw.com](mailto:cbutzer@jw.com)>  
**Sent:** Saturday, January 29, 2022 3:18 PM  
**To:** Edgar Sargent <[esargent@SusmanGodfrey.com](mailto:esargent@SusmanGodfrey.com)>; Edwards, John <[jedwards@jw.com](mailto:jedwards@jw.com)>  
**Cc:** Dickson, Carter <[cdickson@jw.com](mailto:cdickson@jw.com)>; Lam, Angela <[Lam@rlf.com](mailto:Lam@rlf.com)>; Rohrbacher, Blake K. <[Rohrbacher@RLF.com](mailto:Rohrbacher@RLF.com)>; Mowery, Katharine Lester <[Mowery@rlf.com](mailto:Mowery@rlf.com)>; Neerman, Jonathan <[jneerman@jw.com](mailto:jneerman@jw.com)>; Babcock, Chip <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Glover, Joel <[jglover@jw.com](mailto:jglover@jw.com)>; Stephen Shackelford <[SShackelford@susmangodfrey.com](mailto:SShackelford@susmangodfrey.com)>; Justin A. Nelson <[jnelson@SusmanGodfrey.com](mailto:jnelson@SusmanGodfrey.com)>; Davida Brook <[DBrook@susmangodfrey.com](mailto:DBrook@susmangodfrey.com)>; Elisha Barron <[EBarron@susmangodfrey.com](mailto:EBarron@susmangodfrey.com)>; Jonathan Ross <[JROSS@SusmanGodfrey.com](mailto:JROSS@SusmanGodfrey.com)>; Brooke Behrens <[BBehrens@susmangodfrey.com](mailto:BBehrens@susmangodfrey.com)>; Bill Dunseth <[bdunseth@susmangodfrey.com](mailto:bdunseth@susmangodfrey.com)>  
**Subject:** RE: Dominion v. Fox -- NM Documents

**EXTERNAL Email**

Hi Edgar

Just following up on this. Please let us know by 5 pm CT on Monday.

Thanks,  
Carl

**Carl C. Butzer** | Jackson Walker LLP  
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**From:** Butzer, Carl

**Sent:** Thursday, January 27, 2022 6:44 PM

**To:** 'Edgar Sargent' <[esargent@SusmanGodfrey.com](mailto:esargent@SusmanGodfrey.com)>; Edwards, John <[jedwards@jw.com](mailto:jedwards@jw.com)>

**Cc:** Dickson, Carter <[cdickson@jw.com](mailto:cdickson@jw.com)>; Lam, Angela <[Lam@rlf.com](mailto:Lam@rlf.com)>; Rohrbacher, Blake K. <[Rohrbacher@RLF.com](mailto:Rohrbacher@RLF.com)>; Mowery, Katharine Lester <[Mowery@rlf.com](mailto:Mowery@rlf.com)>; Neerman, Jonathan <[jneerman@jw.com](mailto:jneerman@jw.com)>; Babcock, Chip <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Glover, Joel <[jglover@jw.com](mailto:jglover@jw.com)>; Shackelford, Jr., Stephen <[sshackelford@susmangodfrey.com](mailto:sshackelford@susmangodfrey.com)>; Justin A. Nelson <[jnelson@SusmanGodfrey.com](mailto:jnelson@SusmanGodfrey.com)>; Davida Brook <[DBrook@susmangodfrey.com](mailto:DBrook@susmangodfrey.com)>; Elisha Barron <[EBarron@susmangodfrey.com](mailto:EBarron@susmangodfrey.com)>; Jonathan Ross <[JROSS@SusmanGodfrey.com](mailto:JROSS@SusmanGodfrey.com)>; Brooke Behrens <[BBehrens@susmangodfrey.com](mailto:BBehrens@susmangodfrey.com)>; Bill Dunseth <[bdunseth@susmangodfrey.com](mailto:bdunseth@susmangodfrey.com)>

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Edgar

Does Dominion have an unredacted copy of the Halderman report from the *Curling* case? If so, will you agree to produce it to us?

Thanks,  
Carl

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**From:** Edgar Sargent <[esargent@SusmanGodfrey.com](mailto:esargent@SusmanGodfrey.com)>

**Sent:** Thursday, January 27, 2022 2:57 PM

**To:** Edwards, John <[jedwards@jw.com](mailto:jedwards@jw.com)>

**Cc:** Dickson, Carter <[cdickson@jw.com](mailto:cdickson@jw.com)>; Lam, Angela <[Lam@rlf.com](mailto:Lam@rlf.com)>; Rohrbacher, Blake K. <[Rohrbacher@RLF.com](mailto:Rohrbacher@RLF.com)>; Mowery, Katharine Lester <[Mowery@rlf.com](mailto:Mowery@rlf.com)>; Neerman, Jonathan <[jneerman@jw.com](mailto:jneerman@jw.com)>; Butzer, Carl <[cbutzer@jw.com](mailto:cbutzer@jw.com)>; Babcock, Chip <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Glover, Joel <[jglover@jw.com](mailto:jglover@jw.com)>; Shackelford, Jr., Stephen <[sshackelford@susmangodfrey.com](mailto:sshackelford@susmangodfrey.com)>; Justin A. Nelson <[jnelson@SusmanGodfrey.com](mailto:jnelson@SusmanGodfrey.com)>; Davida Brook <[DBrook@susmangodfrey.com](mailto:DBrook@susmangodfrey.com)>; Elisha Barron <[EBarron@susmangodfrey.com](mailto:EBarron@susmangodfrey.com)>; Jonathan Ross <[JROSS@SusmanGodfrey.com](mailto:JROSS@SusmanGodfrey.com)>; Brooke Behrens <[BBehrens@susmangodfrey.com](mailto:BBehrens@susmangodfrey.com)>; Bill Dunseth <[bdunseth@susmangodfrey.com](mailto:bdunseth@susmangodfrey.com)>

**Subject:** RE: Dominion v. Fox -- NM Documents

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Thanks, John. I will get back to you on this request after we've served the responses to your RFPs.